

CERTIFICATE OF SERVICE

I hereby certify that on November 5, 2020, I electronically filed the foregoing **MOTION TO CONSOLIDATE AND BRIEF IN SUPPORT** with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

<i>Buffalo Xerographix Inc. et al. v. The Hartford Ins. Grp. et al., (W.D.N.Y. Index No. 1:20-cv-00520)</i>	<i>Hutch & Assocs., Inc. et al. v. Erie Ins. Co. of N.Y. et al., (W.D.N.Y. Index No. 1:20-cv-00896)</i>
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This 5th day of November, 2020.

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By: /s/ Steven W. Klutkowski

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